

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X

**IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**Civil Action No.
03 MDL 1570 (RCC)**

-----X

This document relates to:

*Thomas E. Burnett, Sr., et al. vs. Al Baraka Investment and Development Corp., et al.,
Case No. 03-CV-5738, 03-CV-9849 (S.D.N.Y.)*

*Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., Case
No. 04-CV-7279 (S.D.N.Y.)*

*World Trade Center Properties, et al. v. Al Baraka Investment and Development Corp, et
al., Case No. 04-CV-7280 (S.D.N.Y.)*

**PLAINTIFFS' MORE DEFINITE STATEMENT AS TO
DEFENDANTS BANK AL TAQWA LIMITED, AL TAQWA TRADE, PROPERTY AND
INDUSTRY COMPANY, AHMED IDRIS NASREDDIN AND YOUSSEF M. NADA**

Counsel for the above-captioned Plaintiffs hereby provide a more definite statement as to Defendants Bank Al Taqwa Limited, Al Taqwa Trade, Property and Industry Company, Ahmed Idris Nasreddin and Youssef M. Nada. This statement, annexed hereto as Exhibit 1, is hereby incorporated into the consolidated Complaints pursuant to the Court's Case Management Order No. 1, dated March 10, 2004, and Case Management Order No. 2, dated June 16, 2004, paragraph 13.

Dated: September 27, 2005

Respectfully submitted,

/S/

Michael E. Elsner, Esq. (NY - ME8337; VA-41424;
SC-72893)

Ronald L. Motley, Esq. (SC-4123)

Jodi Westbrook Flowers, Esq. (SC-66300)

Donald A. Migliori, Esq. (RI-4936; MA-567562;
MN-0245951)

Robert T. Haefele, Esq. (NJ-58293; PA-57937)

Justin B. Kaplan, Esq. (TN-022145)

John Eubanks (MD)

MOTLEY RICE LLC

28 Bridgeside Boulevard
P.O. Box 1792
Mount Pleasant, South Carolina 29465
Telephone: (843) 216-9000

Jayne Conroy, Esq. (NY-JC8611)
Paul J. Hanly, Jr., Esq. (NY-PH5486)
Andrea Bierstein, Esq. (NY-AB4618)
HANLY CONROY BIERSTEIN
& SHERIDAN, LLP
112 Madison Avenue, 7th Floor
New York, NY 10016-7416
Tel: (212) 784-6400

Attorneys for Plaintiffs